

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ERIC GARLAND)	Case No.: 4:23-CV-0064
Plaintiff,)	<u>COMPLAINT FOR CIVIL RICO</u>
)	18 U.S.C. § 1962(c) (Racketeering)
)	18 U.S.C. § 1962(d) (Racketeering Conspiracy)
)	18 U.S.C. §§ 1341, 1349 (Mail Fraud)
)	18 U.S.C. §§ 1343, 1349 (Wire Fraud)
v.)	18 U.S.C. § 1028(a) (Identity Theft)
)	18 U.S.C. § 1951 (Hobbs Act Extortion)
)	18 U.S.C. § 371 (Honest Services Fraud)
)	18 U.S.C. § 371 (Conspiracy)
)	42 U.S.C. § 1983 (Conspiracy Against Rights)
MARY B. SCHROEDER)	42 U.S.C. § 1985(2) (Conspiracy Against Rights)
JOHN R. LASATER)	42 U.S.C. § 1985(3) (Conspiracy Against Rights)
JOAN M. GILMER)	42 U.S.C. § 1988 (Conspiracy Against Rights)
DAVID S. BETZ)	18 U.S.C. § 666 (Federal Program Bribery)
ANTHONY J. CASTRO)	Mo. Rev. Stat. § 575.020
DEAN L. ROSEN)	(Concealing an Offense)
ANTHONY J. STEMMLER)	Mo. Rev. Stat. § 575.050
CATHERINE W. KEEFE)	(False Affidavit)
JAYNE M. GLASER)	Mo. Rev. Stat. § 575.060
<i>aka CASH FOR KIDS LLC</i>)	(False Declarations)
)	Mo. Rev. Stat. § 575.110
KATHERINE PUETZ-)	(Tampering with a Public Record)
GARLAND,)	Mo. Rev. Stat. § 575.130
)	(Simulating Legal Process)
DOES 1-10,)	Mo. Rev. Stat. § 575.160
Defendants.)	(Interference with Legal Process)
)	Mo. Rev. Stat. § 575.260
)	(Tampering with a Judicial Proceeding)
)	Mo. Rev. Stat. § 575.280(2)
)	(Acceding to Corruption)
)	Mo. Rev. Stat. § 483.165
)	(Misfeasance)
)	

AFFIDAVIT OF ERIC A. GARLAND

The undersigned, Eric A. Garland, having first been sworn upon his oath, hereby affirms that the following testimony is true:

1. I drafted the Complaint for Civil RICO filed in the Eastern District of Missouri, styled *Garland v. Schroeder et al.* on October 9, 2023.

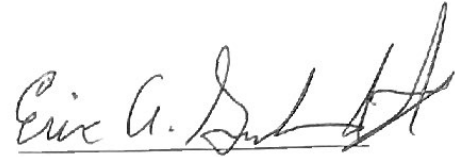
2. All statements in said Complaint are true and made in good faith, made to the best of my personal knowledge, information, and belief.

3. Attached to the Complaint is an email from former Presiding Judge of St. Louis County Circuit Court Michael Burton to Sarah Pleban, Esq., submitted as Exhibit A. I obtained this email between Burton and Pleban from the January 28, 2021 Motion to Disqualify Judges of the Twenty-First Judicial Circuit filed by Evita Tolu in *Tolu v Reid*, 20SL-CC04680 in Missouri circuit court. To the best of my knowledge, information, and belief, no person has denied the authenticity of the email. I have no knowledge of how the email was obtained, nor produced.

4. I personally reduced audio of a video uploaded to YouTube entitled "St. Louis County Family Court Corruption" into written form. The URL of said video as of October 9, 2023 is [https:// www.youtube.com/watch?v=z_Re_bX118k](https://www.youtube.com/watch?v=z_Re_bX118k). The video was uploaded to the account of "Michael Volpe." The written transcription is attached to the Complaint as Exhibit B. I am a native speaker of English, a trained linguist, and professional interpreter/translator with more than twenty years experience transcribing audio recordings from multiple languages. As such, I transcribed every syllable and word of the audio track of said video with the most fidelity possible to the best of my abilities.

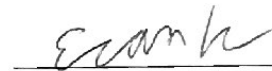
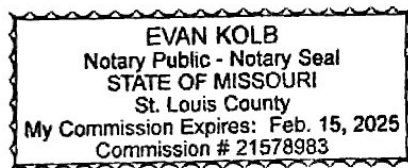
To the best of my knowledge, information, and belief, no individual depicted on said YouTube video has claimed that the video was altered, nor that it was deceptively edited nor that their spoken words were changed. Otherwise, I have no knowledge of how the Zoom call depicted therein was captured, nor how the video was edited, nor by whom.

FURTHER AFFIANT SAYETH NOT.



Eric A. Garland

SUBSCRIBED AND SWORN TO before me this 10 day of October, 2023.



Notary Public